

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

AUG 17 2006

U. S. DISTRICT COURT
E. DIST. OF MO.
ST. LOUIS

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

No.)

JOSEPH KING,)

Defendant.)

4 : 06CR00511CDP

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

BRIBERY CONCERNING A PROGRAM RECEIVING FEDERAL FUNDS

1. At all times material to this Indictment :

A. The City of Berkeley, Missouri, was a local government that received federal assistance in excess of \$10,000 during the one year period beginning July 17, 2005 and ending July 17, 2006.

B. Defendant, Joseph King, was an agent of the City of Berkeley, Missouri, in that he served as City Manager for the City from at least January 1, 2003 until the present day. As City Manager, defendant's duties included supervising the day to day operations of the City, as well as making recommendations to the City Council relative to the issuance of contracts on behalf of the City, including the insurance brokerage contract for the City's property and casualty insurance and workers' compensation insurance policies.

2. On or about July 17, 2006, in St. Louis County, within the Eastern District of Missouri, the Defendant,

JOSEPH KING,

did knowingly and corruptly accept and agree to accept something of value from M.M, that being a cash payment of \$5,000, intending to be influenced and rewarded in connection with the business and a transaction or series of transactions of the City of Berkeley involving the insurance brokerage contract for the City's property and casualty insurance policy for the year 2006 - 2007 having a value of \$5,000 or more to the City of Berkeley and Associated Insurance Group.

In violation of Title 18, United States Code, Section 666(a)(1)(B).

COUNT 2

A SCHEME TO DEFRAUD THE RESIDENTS OF THE CITY OF BERKELEY, MISSOURI OUT OF THE RIGHT TO THE HONEST SERVICES OF A CITY MANAGER

From in or about May, 2003, to on or about July 17, 2006, in St. Louis County, within the Eastern District of Missouri, the defendant,

JOSEPH KING,

the City Manager of the City of Berkeley, Missouri, devised, intended to devise, and knowingly participated in a scheme to defraud the residents of the City of Berkeley by depriving them of their right to the honest services of a City Manager, by accepting cash payments and other funds totaling in excess of approximately \$25,000 in exchange for awarding the insurance brokerage contracts for City of Berkeley property and casualty insurance and workers' compensation insurance policies to Associated Insurance Group, and, in furtherance of the scheme, on or about June 26, 2006, defendant knowingly caused to be

delivered by the United States Postal Service, according to the directions thereon, a Missouri Brokers Service Contract on behalf of the City of Berkeley, from the City of Berkeley, 6140 North Hanley Road, Berkeley, Missouri 63134 and delivered to Associated Insurance Group, 150 Weldon Parkway, Maryland Heights, Missouri 63043.

In violation of Title 18, United States Code, Sections 1341, and 1346.

A TRUE BILL.

FOREPERSON

CATHERINE L. HANAWAY
United States Attorney

HAL GOLDSMITH, #62501
Assistant United States Attorney